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UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

v.

KATHERINE P. KEALOHA (1), *et al.*,

Defendants.

Case No. 17-CR-00582-JMS-RLP

UNITED STATES' MOTION TO FILE
RESPONSE IN EXCESS OF THE
LIMITATIONS SET FORTH IN
LOCAL RULE 7.5

The United States of the America, through its counsel, hereby requests leave to file a response brief in excess of 30 pages or 9,000 words. This request is supported by good cause. The brief presents one omnibus response to five separate defense motions spanning approximately 90 pages. The United States' omnibus response is 38 pages in length and contains approximately 9,962 words. Despite our

best efforts, the number of arguments made by the defendants in the present series of motions precluded one omnibus response under the page and word limit.

For these reasons, the United States respectfully requests leave to file an oversized omnibus brief.

Dated: March 28, 2018.

Respectfully submitted,

JEFFERSON B. SESSIONS III
United States Attorney General

ADAM L. BRAVERMAN
United States Attorney

s/ Janaki S. Gandhi

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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that:

I, Janaki S. Gandhi, am a citizen of the United States and am at least eighteen years of age. My business address is 880 Front Street, Room 6293, San Diego, CA 92101-8893.

I am not a party to the above-entitled action. I have caused service of the foregoing on all parties in this case by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 28, 2018.

s/ Janaki S. Gandhi

JANAKI S GANDHI